

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ROBIN BREDÁ, *on behalf of herself and  
all others similarly situated,*

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a  
VERIZON WIRELESS,

Defendant.

**Civil Action No. 1:16-cv-11512-DJC**

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff respectfully requests that this Court enter an order pursuant to L.R. 7.2 permitting Plaintiff to file her response to Verizon's motion for Summary Judgment and her response to the Statement of Material Facts and any additional facts under seal. In support hereof, Plaintiff states:

Verizon filed a motion for summary judgment that attached a declaration from Plaintiff's telephone provider, Republic Wireless, to support its argument that Plaintiff's cellular telephone number that was originally provided by Verizon is not "a telephone number assigned to a cellular service" as required by the Telephone Consumer Protection Act.

Plaintiff subsequently deposed Republic Wireless as to Plaintiff's cellular service. Republic Wireless designated the entire transcript confidential pursuant to this Court's December 16, 2016 Agreed Confidentiality Order. *Doc. 25*. After Plaintiff objected to this designation, Republic Wireless agreed to undesignate some pages, but not the pages that Plaintiff anticipates citing in response to the summary judgment motion.

As such, Plaintiff seeks to file her response to summary judgment and response to the

statement of material facts along with any additional facts under seal as the extensively cite Republic Wireless' deposition that has been designated confidential. Verizon does not oppose this motion.

The protective order protects sensitive documents and testimony from disclosure. *Doc. 25*. The Order prohibits the public filing of materials designated "CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER" unless otherwise agreed or ordered by the Court. *Id.* at § 7.

Plaintiff suggests the confidential responses be impounded until the resolution of the instant case, or until further order of the court. Plaintiff shall be responsible for post-impoundment custody of the sealed materials.

WHEREFORE, Plaintiff respectfully requests an order granting Plaintiff leave to file her response to summary judgment and response to the statement of material facts along with any additional facts under seal under Seal.

Dated: May 24, 2017

Respectfully Submitted,

/s/ Keith J. Keogh  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 24, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which perfected service on all parties of record.

Respectfully Submitted,

/s/ Keith J. Keogh

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